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Comments to Delta Stewardship Council:

1) The new regulatory regime needs to be graded on actual improvements to species populations and/or Water Quality, not on merely money spent (this could be also stated as do things which actually help, not just spend money on actions which have never been shown to result in any benefit): The Feds are beaming with pride that they are spending hundreds of millions of dollars on projects such as building a fish screen pump facility to take the place of the Red Bluff Diversion Dam or a fish screen at the mouth of the Contra Costa Canal. Back when the Red Bluff Diversion Dam was in year round, salmon and sturgeon were abundant. In response to each reduction of the gates-in period for the RBDD, the numbers of salmon and sturgeon have gone down! While I am not saying taking the gates out is bad for fish, I am saying it's clearly not an important or limiting factor to salmon and sturgeon and it's a waste of money to be focusing on it now. It's just another example of doing business as usual rather than figuring out what's wrong and then fixing the problem. CalFed spend millions on easy things to do, and the result was collapsed fish populations and an electorate angry about money wasted and much less likely to vote to approve additional monies to spend on the problems. And there must be a thousand other diversions which have greater impact to fishes than the Contra Costa Canal, as it's really questionable that any live salmon would be in the stagnant ditch called Rock Slough. If things like X2, getting cold water to certain points on a river, adding in gravel, etc, don't correlate with any increases in fish, and then they need to be abandoned and replaced with other measures, as CA and the Feds just don't have the cash anymore for spending without real performance measures.

2) Take the future water supplies into account: The future will be one of less snow, more rain; the water for the year being dropped on us all during a short period rather than slowly melting off the mnts over the year. Your effort is looking at the delta, but all your water comes from the mnts and dams designed to function in a 1950's hydrology. Where is the water for fishes, WQ and exports going to come from? Your product is going to be worthless if you calibrate it to today's water, for all you'll accomplish is pushing extinction of fishes and collapse of water supplies to the next generation. I think your charge is to get a fix which is good for 100 or more years.

As more extreme rain events come, flood control will have to be the first priority for all reservoirs and their operations, and the delta waterways. Actions which will have to be taken include some combination of greatly increased levees, higher dams, less water held behind dams (so have more freeboard to hold back flood flows), wider and deeper delta channels to get the flood waters away from people, and setbacks where urban development patterns allows. Your plan should account for what will need to be done for flood control, and even better, your plan should recommend how flood control and ecosystems can be designed to work together in this troubled future before us.

As we get to our future of more rain and less snow, we are heading for severe water shortages. Most of the water currently delivered by our dams is snow melt water which slowly comes into the pool throughout the year. As that shifts to rain, most will be released to the sea to make room for the next storm, and the remaining water captured will be nowhere near enough for all the current uses. For example, Friant Dam can store only 600 taf, but it delivers 2.5 maf. All that extra water comes from snowmelt. If all the precip comes as rain, only 600 taf would be available for delivery, and then the

millerton lake will be dry. Same with out other dams. Folsom and Friant dams will be dry in summer, and no water available for delta outflow or river flows. Please take that into account, and if you determine more water is needed, then please say what should be done to get the more water (like build Auburn dam, raise the other dams, abandon exports to southern CA as unsustainable, or whatever). Please just don't say this is the water needed and ignore that in the near future that water won't be there without major changes in storage capacity and consumptive uses of our water. Note also that the Folsom dam is the one currently used for delta WQ (X2) compliance, and in the future it will surely be at dead pool in summer in nearly all years due to flood control needs and its limited storage capacity.

3) Trinity river: At present a maf or more of trinity river water is piped to sac as part of the CVP. As the future climate changes, that water will surely not be available to the CVP and will remain in the trinity system. This will be a major blow to water supply (and power generation as well) and the reduction of supply to the CVP needs to be taken into account, especially was you decide delta inflow and outflow and WQ and water exports.

4) When can we finally come out and say the San Luis Unit of the CVP (Westlands Water District) just isn't a good idea and really never was? Its retirement (about ½ the lands out of production) would save a lot of water, reduce a lot of pollution, and the remaining lands would have greater sustainability.

5) Help the farmland on minimally subsided delta islands remain in agriculture forever, and turn the doomed islands into species habitat. BDCP proposed to let the farmers keep the doomed islands and turn the forever farmable islands into species habitat!

6) There is already a PC, it's called the Folsom South Canal. Finish it and use it! It may not meet all the needs, but it surely would meet some of the need. Perhaps it could supply Stockton and east delta water users, and then they would not need to divert from the Delta.

7) There is no discussion of fixing the existing CVP/SWP export facilities. A decade ago, the Feds did plans and studies which showed that the existing facilities in the south delta could be upgrades and/or replaced fully for only a billion or two and solve all the problems that currently exist except for seismic risk (which wasn't considered then). Why is no-one looking at that whatsoever? Surely there must be some aspects there which can form part of the solution. Is it that the water interests want all of CA to pay the bills, rather than fix CVP and SWP and only they pay that bill? I think the effort was called the Tracy Fish Test Facility and led by Federal Water and Power Resources Service.

8)Sacramento County Sewage: Couldn't the water from the sewage be used by some of Sac County and delta Ag (without going into the river) and this would not only save cost of further treatment of the water but the farmers getting water from the sac county sanitation would have reliable water supply and would no longer need to divert delta water and/or use groundwater, which would help delta and consumes river and not require sac county citizens to get stuck with a big bill for a giant treatment plant. Perhaps even sac county sewage could even sell the water to Ag (not putting in the river, but pipe into Ag distribution system so never need RWQCB permit) and all our bills could go down, and every time we flush we can rest assured that southern CA would get nothing from it.

9) All the cars and bodies found in the canals is indicative of very indifferent and sloppy maintenance of southern CAs' water supply canals. A different agency needs to be put in charge of the canals, to keep out cars, barrels, bodies and who knows what else being dumped into the water supply canals. The junk in the canals tells CA how much the current agencies in charge of our canals really care about our health and safety.

10) It's been a long time since anyone has discussed tidal gates of some sort to keep out rising sea levels. All the assumptions seem to be we have infinite water to release to keep out the sea, but your own people have said that's not in our future. Seems like a gate at the mouth of the delta should be in the discussion, otherwise the delta will be an arm of the sea within our lifetime, and even a PC may not get fresh water, because in the future many of our reservoirs will be dry in summer and without gates, nothing will keep the sea out.

11) Southern CA needs permanent water rationing, water recycling, desalination, Ag land retirement (from irrigated farming) and smart growth as part of any solution. The sooner they start, the cheaper it will be, as they can't get all their water from the delta under any scenario due to climate change induced shifts in precipitation patterns.

12) Most irrigated farm lands were dry land farmed (grew wheat, etc) prior to the water projects. Farming could continue without irrigation projects, it just wouldn't be as profitable or as big a business. It may be cheaper to simply subsidize dry land farming rather than to continue to invest in irrigated agriculture in southern CA.

13) Due to seismic risk, shouldn't the canals and conveyance facilities be on the east side of the valley? The proposed PC just moves a little over but still in a risk area. If surviving an earthquake is the main goal, it seems like things should be shifted much farther to the east than anyone has proposed to date, and perhaps the points of diversion should also be moved from the delta to the reservoirs themselves (like have the new canal start at Oroville and stay on the east side of the valley all the way down to southern CA).

14) I believe Fed National Oceanic and Atmospheric Administration report a few years ago predicted by 2100 the salmon in the central valley will be extinct except for a possible small population sustained by cold water from Shasta Dam. Is your plan going to address that so salmon live in more areas and at greater abundance, or are you going to direct billions to be spent uselessly and the fish all go extinct anyway? Increasing water temperatures for Delta waters is also bad news for delta smelt; does your plan remedy this, or are we proposing to spend billions more on a species whose extinction is certain?

Lastly, I respectfully ask that you please make a complete and comprehensive plan which actually fixes the problem, and don't just come up with something which works for 10-20 years and forces the next generation to re-do this process and address the issues you chickened out on, at 100 times the cost! I hope at least some of my cranky grandma comments are helpful to your process. Thank You. I wish you every success in your endeavor and I applaud your impartial leadership.